

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

REBECCA FRANCESCATTI,)	
)	
)	
)	
Plaintiff,)	No. 1:11-cv-05270
)	
v.)	
)	Honorable Blanche M. Manning
STEFANI JOANNE GERMANOTTA)	Magistrate Judge Jeffrey T. Gilbert
p/k/a LADY GAGA, INTERSCOPE RECORDS,)	
UNIVERSAL MUSIC GROUP, INC.,)	ECF CASE
DJ WHITE SHADOW, LLC, and)	
BRIAN JOSEPH GAYNOR,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**JOINT MOTION FOR AN EXTENSION OF THE TIME TO
COMPLETE LIABILITY EXPERT DEPOSITIONS**

Plaintiff Rebecca Francescatti (“Plaintiff”) and Defendants Stefani Joanne Germanotta p/k/a Lady Gaga, Interscope Records, Universal Music Group, Inc., DJ White Shadow, LLC, and Brian Joseph Gaynor (“Defendants” and, together with the Plaintiff, the “Parties”), by and through their undersigned counsel, hereby jointly move (the “Motion”) this Court to extend the time for the parties to complete liability expert depositions in the above-captioned case for 65 (sixty-five) days, up to and including January 25, 2013. In support of this motion, the Parties state as follows:

1. On August 30, 2012, the Parties filed a Joint Motion to Extend Discovery Deadlines (the “Joint Motion”), requesting extensions of certain liability fact and expert discovery deadlines, including that the time for the Parties to complete liability expert discovery be extended to November 21, 2012. (Docket Entry No. 71.)
2. This Court granted the Joint Motion on September 7, 2012 (the “September 7

Order”), scheduled extended deadlines for service of initial and rebuttal liability expert reports, and ordered that depositions of liability experts be completed on or before November 21, 2012. (Docket Entry No. 73.)

3. Plaintiff has served three liability expert reports. Defendant Germanotta has served four liability expert reports in response. In addition, Plaintiff and Germanotta have served liability rebuttal expert reports pursuant to the September 7 Order.

4. At the time the Parties filed the Joint Motion, they were not aware of the large number of experts that would be deposed in this action. In order to accommodate the schedules of counsel and the experts to be deposed, the Parties now believe that additional time will be needed to complete these expert depositions. Accordingly, the Parties have agreed to extend the deadline for completing liability expert depositions for an additional 65 (sixty-five) days.

5. This Motion for an extension of time is being made in good faith and not for the purpose of hindering or delaying these proceedings.

6. No Party will suffer prejudice if the Court grants this Motion.

7. In light of the circumstances described above, a 65 (sixty-five) day extension of time to complete liability expert depositions would serve the interests of justice.

WHEREFORE, Plaintiff and Defendants respectfully jointly request that this Court grant their joint motion for an extension of the liability expert discovery cutoff by 65 (sixty-five) days, up to and including January 25, 2013.

Dated: October 25, 2012

Respectfully submitted,

/s/Christopher W. Niro

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 25th day of October, 2012.

/s/ Catherine J. Spector

Catherine J. Spector